

130623

FAA-01-8994-45

28903

Author: RKRice@sisna.com at Internet
Date: 9/2/97 11:55 AM
Priority: Normal
TO: 9-NPRM-CMTS at ARM
CC: warren.morningstar@AOPA.ORG at Internet
Subject: Docket No. 28903

38

Dear Sirs:

I am troubled with this proposal and the implications for light general aviation aircraft. It would appear that the proposal would essentially eliminate STC's from being installed on light production aircraft.

There is no evidence that there is a problem with the existing process. This struggling segment of aviation does not need any additional economic hardship. If this proposal were in effect would Cessna or Piper have been able to resume production of their tried and tested but suspended models? One wonders.

Lastly the small STC manufacturers of improvements, accessories and upgrades would probably be put out of business. This would not be good for the industry. We need the old fleet to keep flying to keep flight instructors, mechanics, parts, accessories and even FAA employees employed. Lastly many STC's are safety improvement. For instance the inertia reel shoulder harnesses I have in my 1959 Cessna, the vortex generators commonly being installed on light twins, brake upgrades, avionics upgrades, vacuum pump upgrades, engine and prop upgrades. If this proposal were effected would these improvements/upgrades be available? It's doubtful if a small STC manufacturer could financially absorb the cost of a new type certificate.

I'm sure the intent of the change is safety but the effect on the light general aviation fleet would be just the opposite. Please rewrite the proposal to allow these operations to continue for the general aviation fleet.

Sincerely,

H. Ross Rice
177 N. Roundabout Way
Cedar City, UT 84720